

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Norfolk Division

IN RE: Michael A. James  
Cassie P. James  
Debtors

CASE NO.: 19-70674

Chapter 7

NOTICE OF MOTION

Counsel for Michael A. James and Cassie P. James, the Debtors, have filed papers with the Court to Convert their Chapter 7 to a Chapter 13.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one.**

If you do not want the Court to grant the relief sought in the Motion, or if you want the Court to consider your views on the Motion, then you or your attorney must:

File with the Court, at the address shown below, a written request for a hearing [or a written response pursuant to Local Bankruptcy Rule 9013-1(h)]. If you mail your request for hearing to the Court for filing, you must mail it early enough so the Court will receive it on or before April 8, 2019 and a copy mailed to Gregory K. Pugh.

Clerk of Court  
U S Bankruptcy Court  
600 Granby Street  
Norfolk, VA 23510

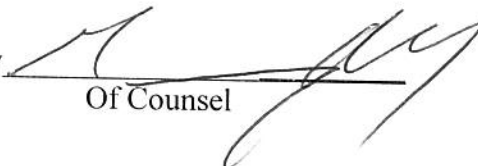
Gregory K. Pugh  
2404 Princess Anne Rd.  
Virginia Beach, VA 23456

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought and may enter an order granting that relief.

Date: 03/18/2019

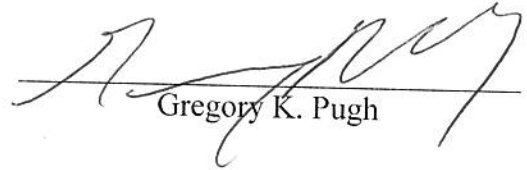
By

Of Counsel



CERTIFICATE

I hereby certify that a true copy of the foregoing Notice of Motion was mailed to The Office of the U.S. Trustee, Room 625, Federal Building, 200 Granby Street, Norfolk, Virginia 23510, to Carolyn L. Camardo, Chapter 7 Trustee, 5101 Cleveland St., Ste. 200, Virginia Beach, VA 23462 and to all creditors on the attached list this 18<sup>th</sup> day of March, 2019



Gregory K. Pugh

Gregory K. Pugh, Esquire  
2404 Princess Anne Road  
Virginia Beach, VA 23456  
(757) 721-2390

Bayview Physicians Group  
PO Box 7068  
Portsmouth, VA 23707

Dominion Energy Virginia  
The CBE Group, Inc.  
PO Box 300  
Waterloo, IA 50704

Elizabeth River Tunnels  
Linebarger goggan Blair & Samp  
PO Box 702118  
San Antonio, TX 78270-2118

Emer Phys of Tidewater  
Credit Control Corp.  
PO Box 120568  
Newport News, VA 23612-0568

Hayson Street Associates  
c/o James T. Cromwell  
281 Independence Blvd., 5th Fl  
Virginia Beach, VA 23462

J. Councill and W. Councill  
M. Rogers & Associates, PLLC  
1403 Greenbrier Pkwy, #200  
Chesapeake, VA 23320

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309 County Street, Ste. 201  
Portsmouth, VA 23704

MedExpress  
1330 Armory Drive  
Franklin, VA 23851

Medexpress Billing  
PO Box 14000  
Belfast, ME 04915-4033

Medical Revenue Service  
645 Walnut St., Ste. 5  
Gadsden, AL 35902

Peninsula Inst. for Comm. Hlth  
1033 28th Street  
Newport News, VA 23607

Southampton County Treasurer  
26022 Administration Center Dr  
Courtland, VA 23837

Southhampton Memorial  
100 Fairview Drive  
Franklin, VA 23851

TACS Taxing Authority  
PO Box 31800  
Henrico, VA 23294

Towne Bank  
200 High Street  
Portsmouth, VA 23704

Vanderbilt Mortgage  
PO Box 9800  
Maryville, TN 37802

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Norfolk Division

In re: Michael A. James,  
Cassie P. James,

CASE NO.: 19-70674

Debtor(s)

CHAPTER 7

MOTION TO CONVERT

NOW COME the debtors, by counsel, and states the following, to-wit:

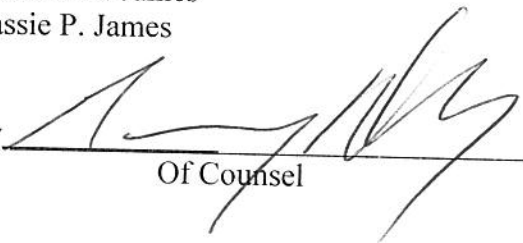
1. That the debtors filed a Chapter 7 Bankruptcy Petition with this Honorable Court on February 22, 2019.
2. That in the Chapter 7, the debtor did not pass the Means Test.
3. That the Debtors wish to convert their Chapter 7 to a Chapter 13.
4. That debtors otherwise qualify for protection pursuant to Chapter 13 of the Bankruptcy Code.
5. That the interests of creditors and the debtors would be better served by such conversion.

WHEREFORE, the debtors pray that their current Chapter 7 case be converted to a case under Chapter 13 of the Bankruptcy Code.

Respectfully submitted

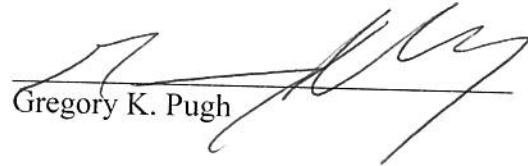
Michael A. James  
Cassie P. James

By

  
Of Counsel

CERTIFICATE

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